



ANDREW CUDDY  
MANAGING ATTORNEY

July 14, 2020

Hon. Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 701  
New York, New York 10007  
LimanNYSDChambers@nysd.uscourts.gov

BENJAMIN KOPP  
ASSOCIATE ATTORNEY  
[BKOPP@CUDDYLAWFIRM.COM](mailto:BKOPP@CUDDYLAWFIRM.COM)  
DIRECTDIAL 315-207-5584

**Re: M.H. et al. v. New York City Dept. of Educ., 20-cv-1923-LJL**

Dear Judge Liman:

The parties request to adjourn the currently-scheduled July 27, 2020 Initial Pretrial Conference, by forty-five (45) days to September 10, 2020, which if granted, would cause a proposed joint Case Management Plan and Scheduling Order to be due September 3, 2020.

Upon review of the Answer and communications with Defendant, Plaintiff is preparing to amend the Complaint as a matter of course, pursuant to Rule 15(a)(1)(B), by July 27, 2020. Currently, in addition to the first cause of action for relief under the fee-shifting provision of the IDEA (20 U.S.C. § 1415), Plaintiff is also seeking relief under three other causes of action for relief relating to implementation of an impartial hearing officer's findings of fact and decision, as well as additional services to compensate for the delays in implementation. While the parties continue to discuss a potential settlement, it is anticipated that amended pleadings will add greater clarity of the issues to such discussions and, if necessary, to the Court.

There has been one prior request for adjournment and extension of time, which was granted to allow Defendant ninety (90) days (i.e., from April 7, 2020 to July 6, 2020) to respond to the Complaint. Part of that request and subsequent, associated order was the adjournment of the then-scheduled May 26, 2020 Initial Conference to July 27, 2020.

Respectfully,

s/ Benjamin M. Kopp  
Benjamin M. Kopp, Esq.

**Application GRANTED. The Initial Pretrial Conference previously set for July 27, 2020 is ADJOURNED to September 10, 2020 at 3:00 p.m. The parties are directed to call (888) 251-2909 and use access code 2123101.**

*No further extensions.*

7/14/2020

A handwritten signature in black ink, appearing to read "Lewis J. Liman".

LEWIS J. LIMAN  
United States District Judge